

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

VICKY RODRIGUEZ TORRES;
LUIS RAFAEL MALDONADO
VAILLANT, and their
conjugal partnership,

Plaintiffs,

vs.

Civil No. 09-1151 (JP)

GOVERNMENT DEVELOPMENT
BANK FOR PUERTO RICO;
JAVIER RAMOS LUINA in
official and individual
capacity; ENID LOPEZ LOPEZ
in official and individual
capacity; ANGEL PEREZ
RIVERA in official and
individual capacity;
JORGE IRIZARRY HERRANS,
in official and individual
capacity; LUIS I. ALFARO
MARTINEZ in official and
individual capacity;
MARINE COMAS TORRES in
official and individual
capacity; NAPHIS TORRES
PADRO, in official and
individual capacity;
EDGARDO RODRIGUEZ NIEVES,
in official and individual
capacity; and ABC
INSURANCE,

Defendants.

The continued deposition of:

VICKY RODRIGUEZ TORRES,
a plaintiff herein, was held at the law offices of
SCHUSTER & AGUILO, 221 Plaza Building, 15th Floor,
221 Ponce de Leon Avenue, San Juan, Puerto Rico 00918,
on Wednesday, August 19, 2009, at 9:53 a.m.

Reported by: Joanne de Thomas

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1 Q. Okay. Against who?

2 A. Against GDB and all the codefendants.

3 Q. Other than this claim, is he--

4 A. Oh, the other one. No.

5 Q. He's not suing anybody else?

6 A. Pardon me? I don't understand clearly.

7 Q. Your husband is a party to this lawsuit.

8 A. To this one that we have?

9 Q. To this one. Yes, he's a plaintiff.

10 A. Yes. Yes.

11 Q. My question is, is he involved in any
12 other lawsuit right now?

13 A. You have to ask him, but--

14 Q. No, I'm asking you.

15 A. Yes.

16 THE DEPONENT: (To Mr. Cuadros) Do I have
17 to answer that?

18 MR. CUADROS: (To the deponent) Answer it,
19 if you know it.

20 THE DEPONENT: Yes, I know.

21 BY MS. REXACH:

22 Q. You know. He's suing Eurobank.

23 A. Yes, he is.

24 Q. Okay. He was terminated from his--

25 A. I'm sorry. It's just that I thought that

1 it was confidential.

2 Q. It's not confidential.

3 A. Okay.

4 Q. Because of his termination from
5 employment?

6 A. Yes.

7 Q. When was he terminated?

8 A. I think it was-- I don't know if it was
9 2007 or 2008. More or less.

10 Q. Okay. Is that a claim, a formal lawsuit,
11 or is it at the administrative level?

12 A. No. That's a formal lawsuit.

13 Q. A formal lawsuit.

14 A. A formal lawsuit.

15 Q. Where is it pending?

16 A. At the state, local...

17 Q. Are you a plaintiff in that case as well?

18 A. Yes.

19 Q. You see, I asked you before whether you
20 were a party to any other lawsuit and we listed
21 Walgreens, we listed Ponce Bank and you didn't respond
22 to this one.

23 A. I'm sorry. And I told you that I thought
24 it was very confidential.

25 Q. Okay. But, see, again, you are making

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1 conclusions as to documents and questions that are
2 being posed as to what is confidential and are not
3 answering because you conclude that that is
4 confidential.

5 A. I am not a lawyer.

6 MS. REXACH: Counsel, we can go off the
7 record. Can you explain this to her?

8 MR. CUADROS: I have no desire to do so.

9 MS. REXACH: Okay. No desire to do so.

10 MR. CUADROS: You are doing such a good
11 job.

12 BY MS. REXACH:

13 Q. The decision of whether or not something
14 is confidential is not to be made by you. It's made by
15 the attorneys, okay?

16 So if I ask you a question, you have to answer
17 it fully. You're under oath. You need to answer
18 fully. If you have any reservations--

19 A. Okay.

20 Q. --as to the nature of that information,
21 you have to so state that you have reservations as to
22 the nature of that information and then we will decide
23 how to proceed, whether you will consult with your
24 attorney or not.

25 A. Okay. No problem.